

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Chicago Police Officers SHANNON
SPALDING and DANIEL ECHEVERRIA,

Plaintiffs,

V.

CITY OF CHICAGO, Chicago Police Chief
JUAN RIVERA, Chicago Police Chief
JAMES O'GRADY, Chicago Police Chief
NICHOLAS ROTI, Chicago Police Lt.
Sergeant MAURICE BARNES, Chicago Police
Lt. ROBERT CESARIO, Chicago Police
Commander JOSEPH SALEMME, Chicago
Police Sergeant THOMAS MILLS,

Defendants.

Case No. 12-cv-8777

Judge Gary Feinerman

Magistrate Judge Sheila M. Finnegan

PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' THIRD MOTION *IN LIMINE* TO BAR ANY TESTIMONY, EVIDENCE OR ARGUMENT OR REFERENCE TO OTHER CIVIL LAWSUITS, COMPLAINT REGISTERS AND/OR DISCIPLINARY HISTORIES OF THE INDIVIDUAL DEFENDANTS AND OTHER POLICE PERSONNEL WHO MAY TESTIFY

Plaintiffs agree that they will not attempt to introduce any testimony, evidence or argument or reference to other civil lawsuits, complaint registers and /or disciplinary histories of the individual Defendants, but reserve the right to introduce such evidence with regard to other police personnel who may testify or with regard to Plaintiffs' *Monell* claims. At this point, the Defendants have not identified other police personnel who may testify and therefore Plaintiffs are unable to determine whether they will attempt to introduce testimony of prior complaint registers, civil lawsuits and or disciplinary histories. Therefore Defendants motion should be denied.

Respectfully submitted,

/s/ Jeffrey L. Taren

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